

James Oliver Romine Jr. Pro Se Litigant
12494 Ironwood Dr.
Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

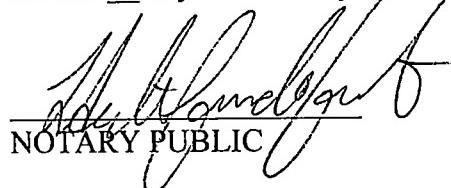
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: _____</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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I James Oliver Romine Jr, depose and state that Attachment A is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

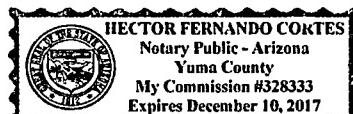


Dated this 12 day of February 2016
James Oliver Romine Jr.
12494 Ironwood Dr.
Yuma, Arizona 85367

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me this 12 day of February 2016.



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Attachment A

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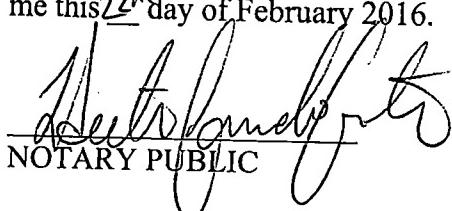
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.:</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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I James Oliver Romine Jr, depose and state that Attachment B is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

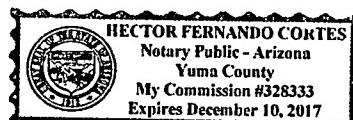


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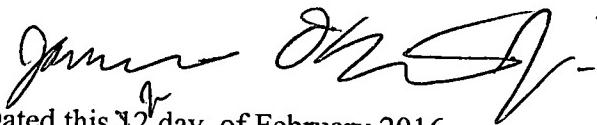
Attachment B

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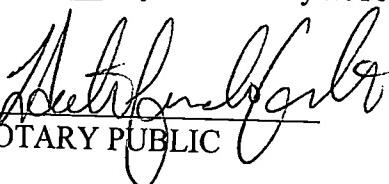
**IN THE UNITED STATES DISTRICT COURT
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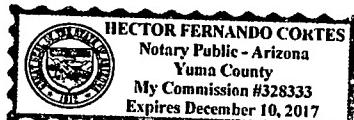
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.:</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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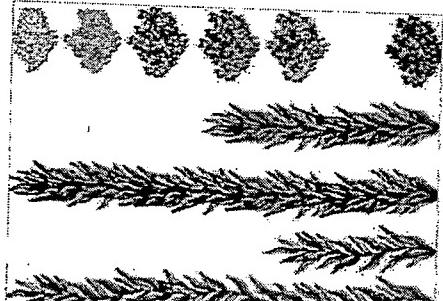
I James Oliver Romine Jr, depose and state that Attachment C is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.


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243166309

9/2/15

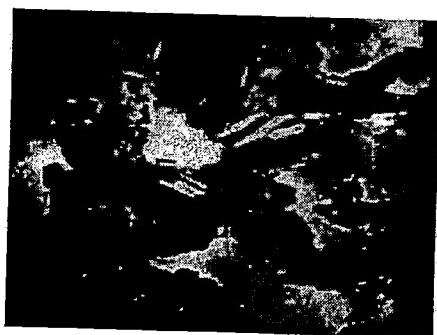
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9/3/15

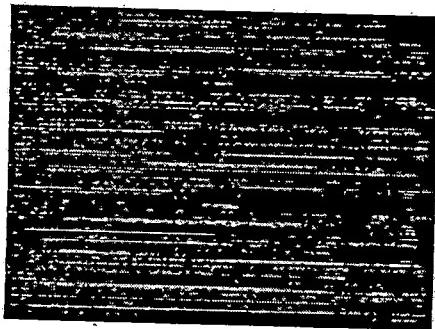
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242774797

9/4/15

Standard License



168852164

9/4/15

Standard License

Attachment C

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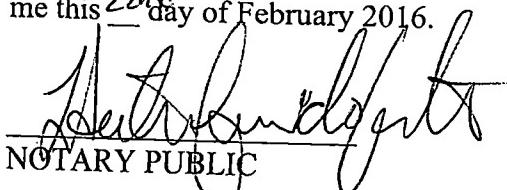
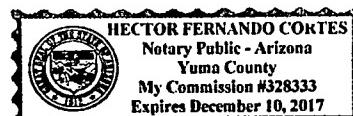
JAMES OLIVER ROMINE JR. Plaintiff v. JAMES NICHOLAS STANTON Defendant	Case No.: AFFIDAVIT OF VERIFICATION TRIAL BY JURY: No
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I James Oliver Romine Jr, depose and state that Attachment D is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.



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You can watch video footage of *Devil's Share* and *Galactic Hitman* by clicking those prior links – they carry all the classic hallmarks of a Digital Homicide production. The assets are all store-bought, they're both hideous to look at, interactively generic, unfinished, and broken in some significant way. The only difference is the rebranding of the developer – surely a response to the fact that James and Robert Romino know their prior company's name is mud on Steam these days.

It's also worth noting that *Galactic Hitman*'s artwork has been taken from elsewhere, just like the initial art for *The Slaughtering Grounds* was. You can see the original imagery here, which FAKER-ECC may have purchased from Shutterstock. Does DH even *have* a single artist?

[Note: Initially I suggested Digital Homicide just took the image from a Deviantart artist without permission, not knowing it was also sold on Shutterstock. The text has been edited to reflect this.]

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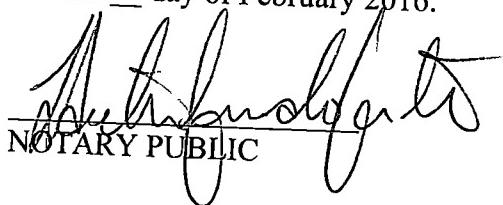
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I James Oliver Romine Jr, depose and state that Attachment E is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

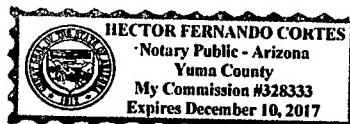


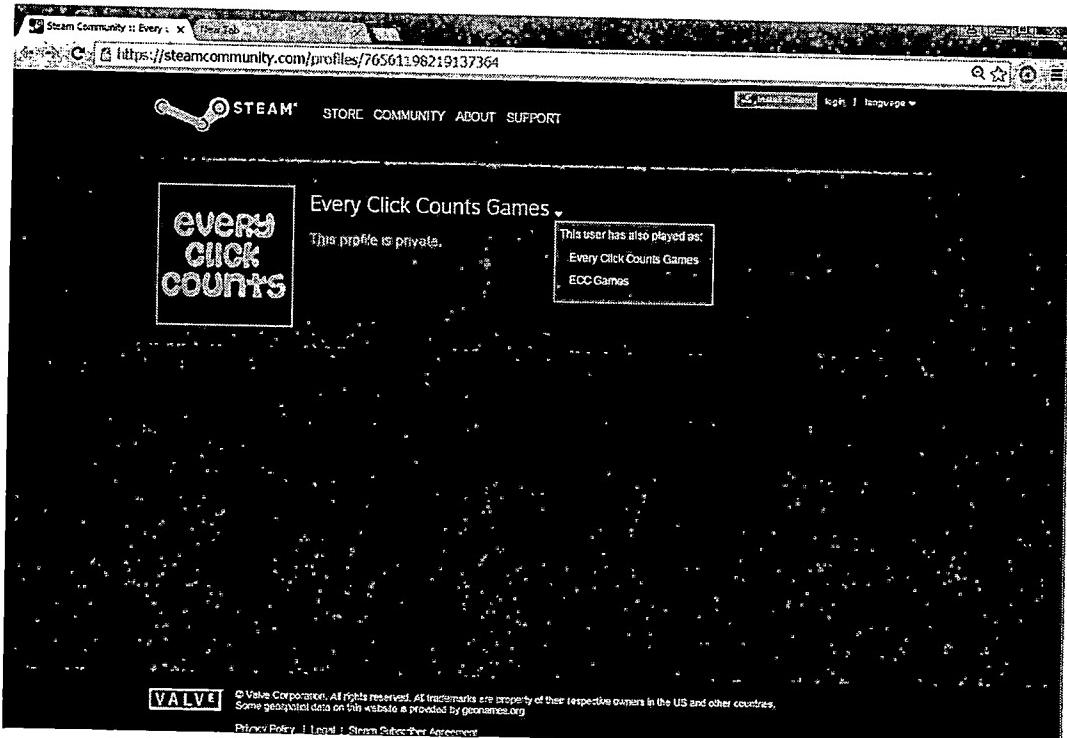
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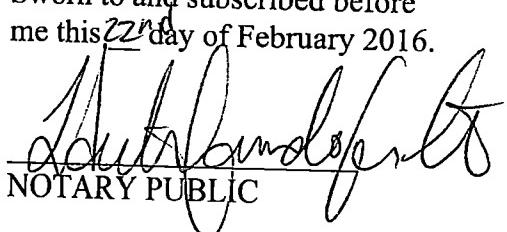
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.:</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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I James Oliver Romine Jr, depose and state that Attachment F is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

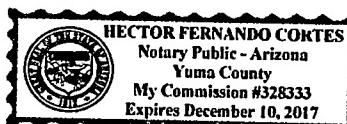


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When you can name yourself literally *anything* on Steam, it's impossible to know who is a legitimate developer and who isn't, as we've seen with the case of Faker-ECC. Apparently you don't need to prove your company's legitimacy or even *existence*, since it's all based on usernames. Here, we've seen it lead to potential legal trouble for the folks who rebranded and accidentally defamed a completely different studio.

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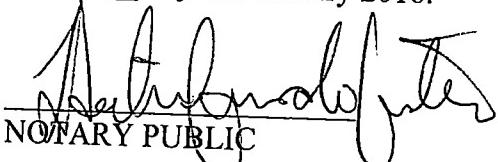
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.:</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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I James Oliver Romine Jr, depose and state that Attachment 6 is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

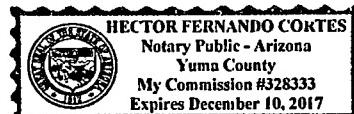


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**Piotr Wątrocki**
CEO
Games Producer

**Jakub Traczyk**
Technical Director

**Jakub Jamioł**
Project Artist

**Marcin Macharzewski**
Photo Writer

**Hubert Bibrowski**
Creative Director
Roguebas Canada

**Michał Tomaka**
Designer
Roguebas Canada

**Piotr Kowalski**
Programmer

**Piotr Roswag**
Senior Programmer

**Jerzy Sokołowski**
Game Designer

**Dorota Muzyńska**
Games Producer

**Rafał Majzer**
Designer
Roguebas

**Daria Widermarńska-Spala**
Artist

ADDRESS
EEC GAMES Sp. z o.o.
NIP / VAT: PL6292659944
REGON: 147-01-145
KRS: 0000540727
Wysokość Kapitału:
Zarejestrowego 1 139 000 00 zł.

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Attachment G

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**IN THE UNITED STATES DISTRICT COURT
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I James Oliver Romine Jr, depose and state that Attachment H is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

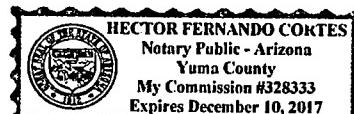


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Wysokość kapitału
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Eccentricity



Attachment H

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**IN THE UNITED STATES DISTRICT COURT
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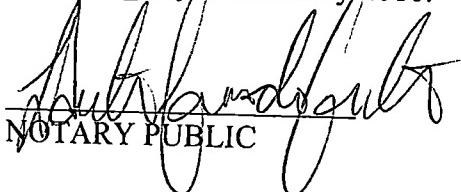
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.:</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
--	---

I James Oliver Romine Jr, depose and state that Attachment I is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

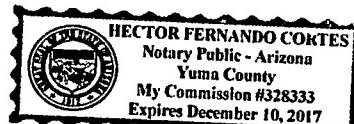


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Someone on Twitter asked me how they "got away" with calling themselves ECC Games. The fact is, they didn't have to "get away" with anything, at least not as far as Steam is concerned. Once again, Valve's lack of oversight makes it easy to just call yourself ECC Games, regardless of who is *actually* allowed to trade under that name.

Digital Homicide's official channels have maintained radio silence for months, seeming to operate solely through these sockpuppet companies. Being as sly as the Wet Bandits, however, it hasn't taken long for the Internet to dig up their latest sleazy shenanigans.

At some point, this "studio" is going to have to realize it is neither talented enough to become a producer of good games, nor clever enough to trick us into believing it is.

That's not going to happen today though, and its recent chicanery may lead it into very real legal trouble.

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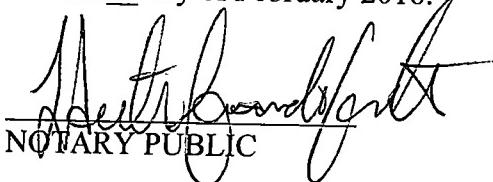
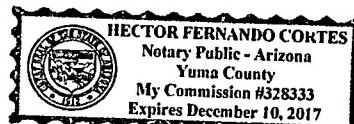
JAMES OLIVER ROMINE JR. Plaintiff v. JAMES NICHOLAS STANTON Defendant	Case No.: AFFIDAVIT OF VERIFICATION TRIAL BY JURY: No
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I James Oliver Romine Jr, depose and state that Attachment K is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.



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OHIM Trademark	
01047039 - Roll in the hole	Status: Registered (2012-10-09)
(15) Date of the registration	2012-10-09
(20) Date of filing of the application	2011-12-28
(21) Serial number of the application	01047039
(22) Language(s) of the application	pl
(18) Expected expiration date of the registration period	2021-12-28
(54) Representative of the mark where the mark is filed or sent in standard characters.	Roll in the hole
(55) Indication referring to the nature of the kind of mark	Trade mark
(55b) Indication referring to the nature of the kind of mark	Word
(73) Name and address of the applicant	Piotr Wartuck Izaieldz - Izaław 105-105j PL- 02-002 Warsaw, Poland
(74) Name and address of the representative	JAZZYNA WYSPIŃSKA-KANCZYLKA PRAWNO PATENTOWA Wały Piastowskie 10/12, 00-105 Warsaw, Poland
(51) Indication to the effect that the mark has acquired distinctiveness through use	False
(51) The International Classification of Goods and Services for the Purposes of the Registration of Marks (Nice Classification) and the list of goods and services classified according thereto	<p>9 Scientific, nautical, surveying, photographic, cinematographic, optical, measuring, checking, supervising, signaling and teaching apparatus, and instruments; Apparatus and instruments for conducting, switching, transforming, accumulating, regulating or controlling electricity; Apparatus or recordings, transmission or reproduction of sound or images; Magnetic, data carriers, recording discs; Automatic vending machines and mechanisms for coin-operated apparatus; Cash registers; calculating machines, data processing equipment and computers; Fire-extinguishing apparatus; Recorded computer software; Computer programs (downloadable software); Recorded computer programs, magnetic data media</p> <p>28 Games and playthings; Gymnastic and sporting articles not included in other classes; Decorations for Christmas trees; Games and playthings; Gymnastic and sporting articles not included in other classes; Play balloons; Swimming pools [play article].</p>
41 Educator; Providing of training; Entertainment; Sporting and cultural activities; Games services provided online [via computer networks]; arranging competitions; Education or entertainment	
<input type="button" value="Back"/> <input type="button" value="Print"/> <input type="button" value="Save"/> <input type="button" value="Send"/> <input type="button" value="Help"/> Page 20 of 36 ID: 3274 Date: 20/10/2016	

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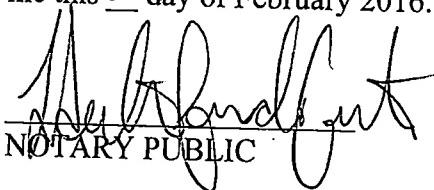
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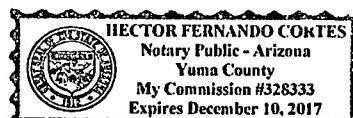


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status/647005008819437568

Jim Sterling
@JimSterling

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According to the email, this ECC Games is pursuing legal action against Digital Homicide for using its name. Not enough popcorn on Earth.

RETWEETS 59 LIKES 392

4:09 AM - 24 Sep 2015

Mhykul @Spsmosett · 24 Sep 2015
@JimSterling The plot thickens..

Nick Piers @NickPiers · 24 Sep 2015
@JimSterling I've said it once, I'll say it again: Digital Homicide is the gift that keeps on giving. Because they're idiots.

Jonathan McCabe @Moist_stunge · 24 Sep 2015
@JimSterling HIT THE LEVER

Robert Koganov @TH3xR34P3R · 24 Sep 2015
@JimSterling Oh this is going to be a good episode when you make it lol

John Sinderman @JSinderman · 24 Sep 2015
@JimSterling I can't even. Can we be sure Digital Homicide isn't some sort of brilliant performance art troupe?

Show more.

Attachment M

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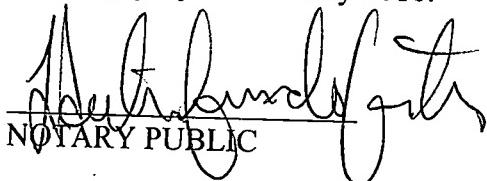
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I James Oliver Romine Jr, depose and state that Attachment N is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

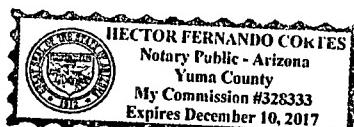


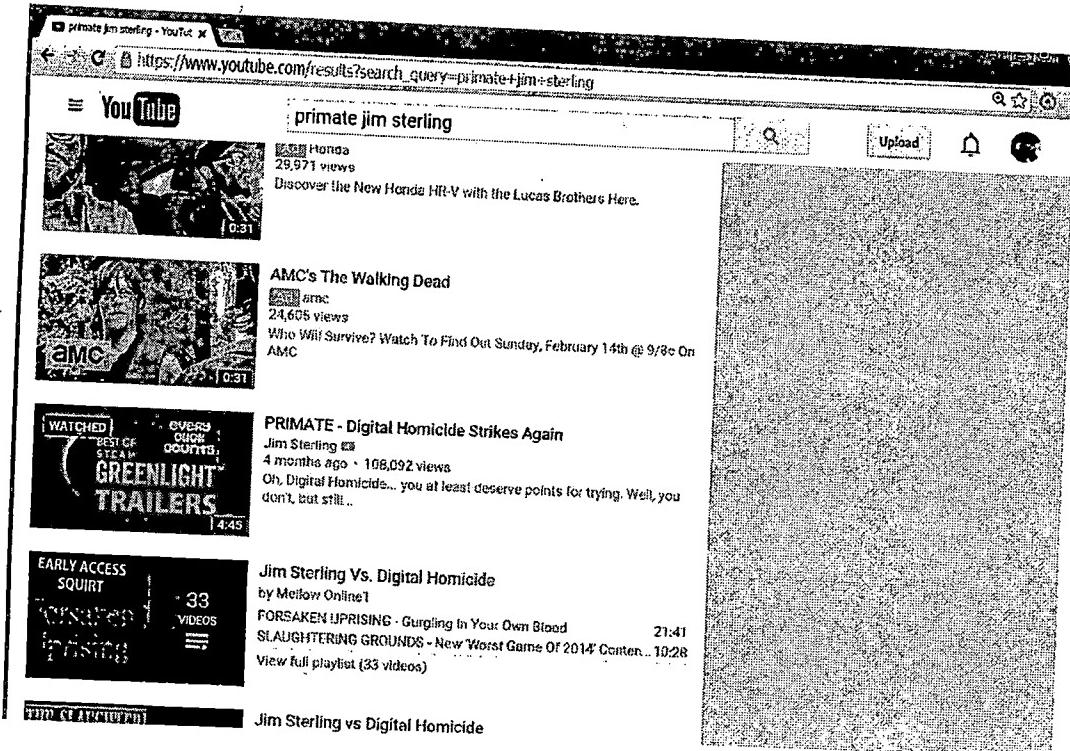
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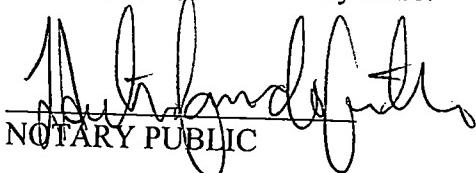
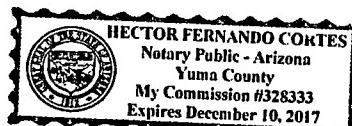
JAMES OLIVER ROMINE JR. Plaintiff v. JAMES NICHOLAS STANTON Defendant	Case No.: AFFIDAVIT OF VERIFICATION TRIAL BY JURY: No
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I James Oliver Romine Jr, depose and state that Attachment O is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.



Dated this 21 day of February 2016
James Oliver Romine Jr.
12494 Ironwood Dr.
Yuma, Arizona 85367

Sworn to and subscribed before
me this 21st day of February 2016.


NOTARY PUBLIC

Jim Sterling (@JimSterling)
Jesus Christ, I just got an email from ECC Games saying they're NOT the ECC Games Digital Homicide named itself after. This is weeeeird.

RETWEETS 26 LIKES 161

4:08 AM - 24 Sep 2015

Franklin J Gomes (@FranklinJGames · 24 Sep 2015
@JimSterling Next thing is DH publishing games under the name Konami

Jake @Nakkeruke · 24 Sep 2015
@JimSterling so, they're either lying or Digital Homicide decided to disguise(?) themselves in plain sight

Kanthes @McKanthes · 24 Sep 2015
@JimSterling So there's 2 ECC Games? Legit ECC and Digital Homicide ECC?

Decentsauce @Decentsauce · 24 Sep 2015
@JimSterling Wait... So they blame you for giving them a bad name but don't care if they try to ruin someone else's reputation?

Garrett Mullikin @Themusicalman79 · 24 Sep 2015
@JimSterling Well. That can't be good.

Michael Hanley @MichaelHanley16 · 24 Sep 2015
@JimSterling so your saying digital homicide is not just doing unity asset store

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

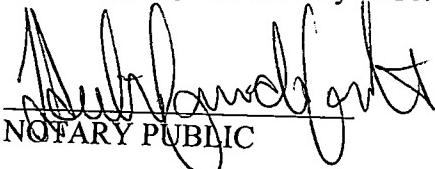
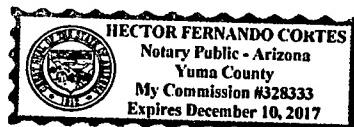
JAMES OLIVER ROMINE JR. Plaintiff	Case No.: AFFIDAVIT OF VERIFICATION
v. JAMES NICHOLAS STANTON Defendant	TRIAL BY JURY: No

I James Oliver Romine Jr, depose and state that Attachment Q is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.



Dated this 12 day of February 2016
James Oliver Romine Jr.
12494 Ironwood Dr.
Yuma, Arizona 85367

Sworn to and subscribed before
me this 20 day of February 2016.


NOTARY PUBLIC

A screenshot of a Twitter post from Jim Sterling (@JimSterling). The post includes a thumbnail image of a man in a suit, a bio section, and a main tweet with several replies.

Profile: Jim Sterling (@JimSterling) • 59 tweets • 1,341 following • 1,341 followers

Bio: Jim Sterling, CEO of Twill Longer, a digital marketing agency. Jim is a speaker, author, and podcaster.

Post:

Important: xenobytestudios.com has **NOTHING** to do with the bitter newspaper strongly rumored to be Digital Handicaps who recently attempted a character assassination via a tumblr blog called "Jim Flips The Bird." (<http://jimflipssthebird.tumblr.com/>)

It's come to my attention that some people have been sending messages to the owners of xenobytestudios.com and xenobytestudios.co.us. Two sites owned by a small group of university students who are NOT related to the Ivan Radis' character who has been trying to cause trouble under the handle of @xenobytestudios

The real XenoByte Studios (the students) have been receiving harassment. Something I've already had to directly ask some of you to STOP DOING.

Again, I ask:

PLEASE STOP HARASSING PEOPLE ON MY BEHALF.

This is an EXCELLENT example of why it's a bad idea. Due to what is clearly an individual with audge misusing an existing studio name to attack me, some innocent people have been caught in the crossfire and I'm currently apologizing to them bigtime over what a select few of you have done.

I love the support you people give me, and I love seeing the word spread when I'm a target of bullsh!t, as it happens a lot and I know^{ing} I'll have my back is amazing. But leave it at support and spreading of awareness. Please please PLEASE do not get personal with developers, try to make their personal info, send them threatening or hateful emails, or anything like that. It makes all of you, it makes me, look like bad people. We're better than folks like the so-called Ivan Radis.

Thank you.

Replies:

• [Reply](#) · [Report Post](#)

Media:

Links:

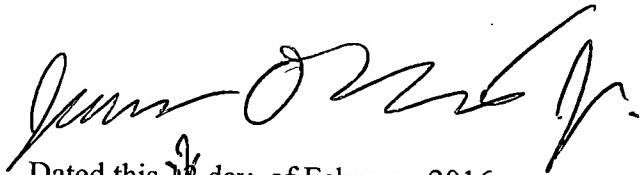
http://www.twilllonger.com/jimsterling_1stlife4

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

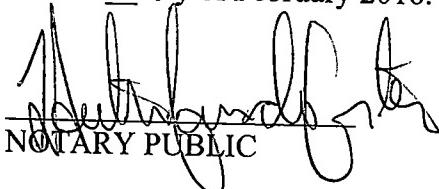
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.:</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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I James Oliver Romine Jr, depose and state that Attachment R is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

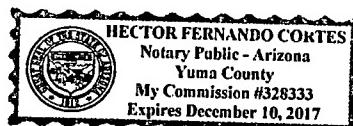


Dated this 22 day of February 2016
James Oliver Romine Jr.
12494 Ironwood Dr.
Yuma, Arizona 85367

Sworn to and subscribed before
me this 22nd day of February 2016.



NOTARY PUBLIC



Do you think UN regulation of the internet is really a bad thing? Given how poorly many countries handle their legal systems over the internet (particularly America), wouldn't it be a benefit if they just revised the agreement?

The UN thing is so amazingly overblown. It will not "censor the Internet" and the things I've read about Anita Sarkeesian having the power to get people arrested is unfathomably delusional. I think it's a good thing that the UN is looking into tackling online abuse and harassment, and I'd say the same thing of Google's recent efforts too. The only people who have anything to be afraid of here are, well, abusers and harassers. Anybody likening it to SOPA and PIPA are being ludicrous, and showcasing their complete lack of aptitude for real politics they repeatedly dabble in while claiming they hate politics being involved in everything.

2 days ago

Jim, why do you feel it was necessary to out ECC games as Digital Homicide? It's clear that with the new identity, these guys wanted to start anew and leave the past behind. They can still be criticized, sure, but I think it's spiteful to bring their past reputation into it if it's not relevant.

Yeah it was, because Digital Homicide is more than just a bad developer. It's had a history of shady and dishonest behavior. Behavior it was continuing under its new name. The very fact it was damaging the reputation of another company entirely is bad enough, to say nothing of its continued efforts to push games through Greenlight via unscrupulous means.

I will not deny the pleasure I take in sticking it to them, but their name is mud for a reason, and people deserve to know who's really selling them products.

2 days ago

5 people like this

Were you going to share the reason why Mojang tech's take down failed? I read that on Twitter earlier and haven't found any follow-up.

I will, yes, but currently it's not something I can share. I'm chomping at the bit to talk about it, and will do as soon as I can. It's potentially Jimquisition material, to boot.

7 days ago

1 person likes this

Considering the decision by Ubisoft to include a trans person in the new AC, I'm guessing the new Jimquisition is going to be talking about representation of social and ethnic groups in video games, am I close? {I assume ethnic groups because of the picture of Vass} It is more distinctly tied to Vass and similar things.

2 days ago

2 people like this

Isn't it funny how some people can't comprehend that a male might be interested in female rights so they have to come up with a "his wife/gf makes him say that!!!" story just to prevent their narrow minds from exploding? Good thing none of that is real.

Step 1: Find a woman to blame.

Step 2: Dribble.

2 days ago

4 people like this

not a question but in response to the question about nitpick theater and audience enjoying it.

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

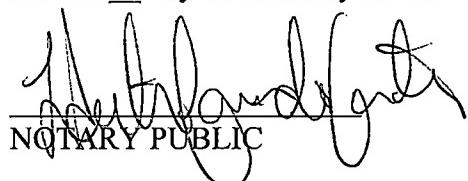
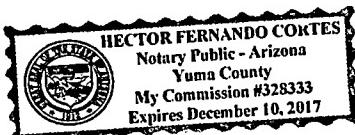
JAMES OLIVER ROMINE JR. Plaintiff v. JAMES NICHOLAS STANTON Defendant	Case No.: AFFIDAVIT OF VERIFICATION TRIAL BY JURY: No
---	--

I James Oliver Romine Jr, depose and state that Attachment u is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.



Dated this 12 day of February 2016
James Oliver Romine Jr.
12494 Ironwood Dr.
Yuma, Arizona 85367

Sworn to and subscribed before
me this 20th day of February 2016.


NOTARY PUBLIC

SteamCommunity.com/app/393390/discussions/

Cat Simulator

STEAM STORE COMMUNITY DIGITAL HORSCODE ABOUT SUPPORT

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Showing 1-5 of 33 entries

Post	Author	Created	Comments	Upvotes	Downvotes
dintt Rollin' Fier Than A Backpage Whiner	EvilTech	1 hour ago	1,234,567 >	1,165	74
Reviewers is going to put up positive review?	Krazy_Cheet	2 hours ago	1,234,567 >	1,165	74
Would be better...	Wes1448	2 hours ago	1,234,567 >	1,165	74
Is it really? Drama	Asper Flipping garbage	2 hours ago	1,234,567 >	1,165	74
Some one actually made better game in like 1 hours	camarade4444	2 hours ago	1,234,567 >	1,165	74
The perfect Eevee	Mrin roasted son	2 hours ago	1,234,567 >	1,165	74
How to get this game COMPLETELY FOR FREE! (if you wish so)	Eyesless	2 hours ago	1,234,567 >	1,165	74
It's not a cat	ebetts	2 hours ago	1,234,567 >	1,165	74
Not a complete cat simulator without 99% sleeping, just saying...	Dorkyta	3 hours ago	1,234,567 >	1,165	74
Assass's Flight!	Assass's Flight!	4 hours ago	1,234,567 >	1,165	74
Vapegamerzzzzz	Aster	4 hours ago	1,234,567 >	1,165	74
BORN!!	BornBacked2012	4 hours ago	1,234,567 >	1,165	74
Jimjiblition: Cat Simulator	Jimjiblition: Cat Simulator	4 hours ago	1,234,567 >	1,165	74
HanselAndGretel	HanselAndGretel	4 hours ago	1,234,567 >	1,165	74
Recycling publicly available assets doesn't constitute a "game"	Da_denz	10 hours ago	1,234,567 >	1,165	74
False positive reviews	Ashey	10 hours ago	1,234,567 >	1,165	74
Showing 1-5 of 33 entries			1,234,567 >	1,165	74
			1,234,567 >	1,165	74

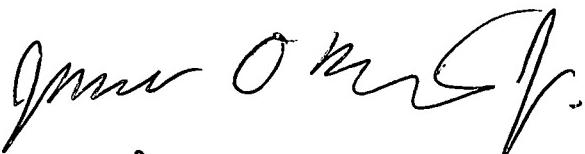
Page 13 of 50

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

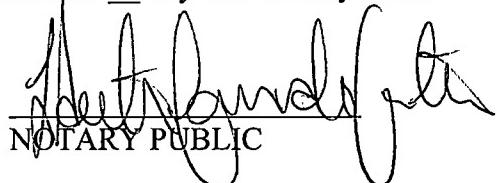
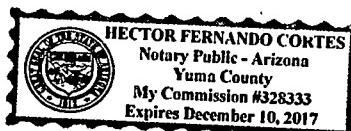
JAMES OLIVER ROMINE JR. Plaintiff v. JAMES NICHOLAS STANTON Defendant	Case No.: AFFIDAVIT OF VERIFICATION TRIAL BY JURY: No
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I James Oliver Romine Jr, depose and state that Attachment V is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.



Dated this 22 day of February 2016
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Sworn to and subscribed before
me this 22nd day of February 2016.


NOTARY PUBLIC

[steamcommunity.com/app/393390/discussions/#p2](#)

 STEAM STORE COMMUNITY ABOUT SUPPORT

[Cat Simulator](#)

All Discussions Screenshots Author Broadcasts Videos News Guides Reviews

Show 15-30 of 63 entries < 1 2 3 4 5 6 >

Feb 15 @ 8:58am 1 Search discussions

Start a New Discussion

Assets used In this game are used ILLEGALLY!

This exists because?

Inquisition skewering

Korrasion

Hey now...

gamerab1986

THERE IS NO CATS IN THIS GAME!

***Project CATS* second try**

WA, the Show

75% positive reviews?

PopPap

who voted for this?

The Woodsbo Soter

How much money was spent paying for positive reviews?

What they're saying is...

NataliaStar

he didnt even give me a ban reason

Pitboss Qesterina

can't find project cats on the store

IM A FUCKING RECTANGLE

Opinions please.

Guitar

Showing 15-30 of 63 entries < 1 2 3 4 5 6 >

Per Page: 15 30 50

Store Page | Log in | Logout

Feb 15 @ 7:26am 266

Feb 15 @ 8:26am 4

Feb 15 @ 8:27am 45

Feb 14 @ 7:27pm 75

Feb 14 @ 8:11pm 0

Feb 14 @ 8:02am 3

Feb 14 @ 8:15pm 7

Feb 14 @ 8:43am 8

Feb 14 @ 4:31am 7

Feb 14 @ 2:02pm 4

Feb 14 @ 11:11am 0

Feb 13 @ 11:23pm 7

Feb 13 @ 8:10pm 8

Feb 13 @ 7:46pm 5

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**IN THE UNITED STATES DISTRICT COURT
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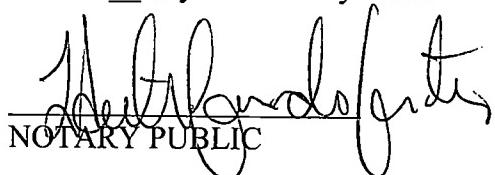
<p>JAMES OLIVER ROMINE JR. Plaintiff v. JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: AFFIDAVIT OF VERIFICATION TRIAL BY JURY: No</p>
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I James Oliver Romine Jr, depose and state that Attachment Z is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

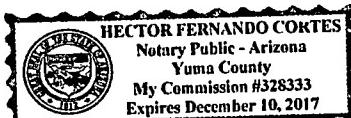


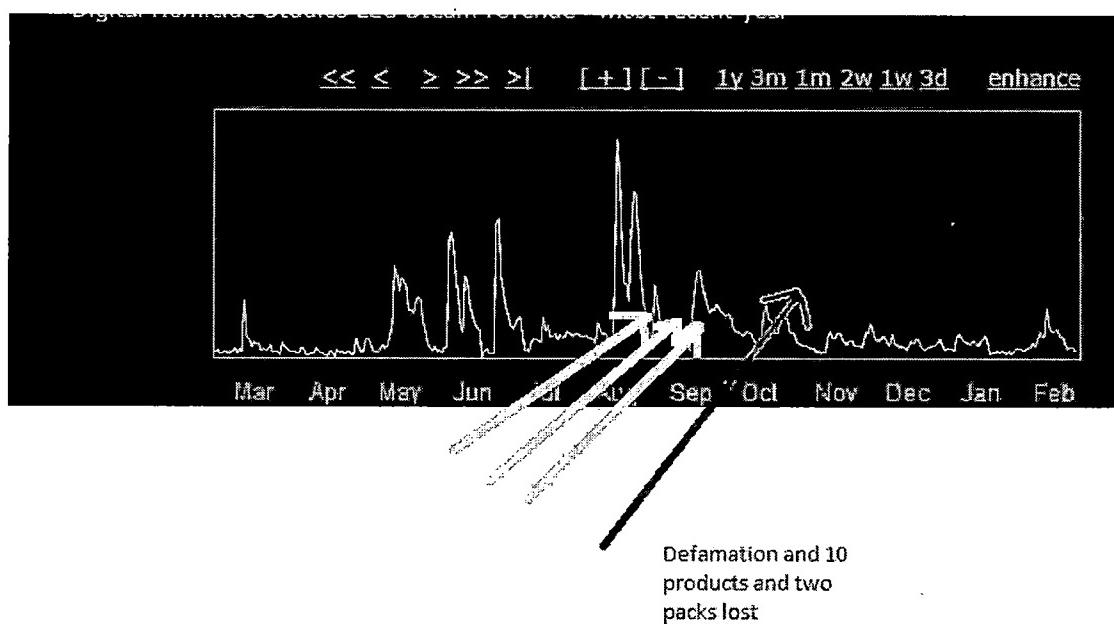
Dated this 22 day of February 2016
James Oliver Romine Jr.
12494 Ironwood Dr.
Yuma, Arizona 85367

Sworn to and subscribed before
me this 22nd day of February 2016.



NOTARY PUBLIC





The 3 White arrows express the addition of products to submission stage by Every Click Counts and The Plaintiff's other Trade Names. This is initial standard product staging before being incorporated.

The Grey Arrow indicates the loss of these products and advertising efforts.